

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Conditional Major, Operating
Permit: F-08-021, Renewal
Adcom Wire Company

August 6, 2008

Vahid Bakhtiar, Reviewer

SOURCE ID:	21-113-00012
AGENCY INTEREST:	2275
ACTIVITY:	APE20070001

SOURCE DESCRIPTION:

Adcom Wire Company in Nicholasville, Kentucky produces steel wire that is distributed both intra-company for bedspring manufacture and external outside sales. The facility produced 150,910 tons of cold drawn wire at the facility in 2006. The general production processes employed by Adcom Wire entail sulfuric acid pickling and cold drawing.

PUBLIC AND U.S. EPA REVIEW:

On July 1, 2008, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Nicholasville Jessamine Journal* in Nicholasville, Kentucky. The public comment period expired 30 days from the date of publication. During this period no comments were received from the general public.

Comments were received from Adcom Wire Company on July 16, 2008. Attachment B lists the comments received, and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received; however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. The following is a detailed explanation of changes made to the permit and supporting documents.

COMMENTS AND RESPONSE:

Comments on the Draft Conditional Major Permit submitted by Steve Riley, Plant Manager, Adcom Wire Company.

Conditional Major Permit:

1. Page 2/15: Item 1c – The Fiberglass Air Scrubber shall operate at all times *that the pickling process is operational*. As written the permit stipulates that the scrubber must operate at all times, even when the plant is not in operation.

Division's response: Comment acknowledged, change made.

2. Page 3/15: Item 4a – The second sentence should read “*If visible emissions other than steam*

are observed, the permittee shall determine the opacity of emissions using U.S. EPA reference method 9.” As written we need to conduct a method 9 if we observe steam coming from the scrubber.

Division’s response: Comment acknowledged, change made.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.